

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
WILLIAM HARVEY GOODLING	:	
fdba William H. Goodling Construction	:	CASE NO. 1:21-bk-01819
KELLY JEAN GOODLING	:	
Debtors	:	
	:	
ORRSTOWN BANK,	:	
Movant	:	
	:	
v.	:	
	:	
WILLIAM HARVEY GOODLING	:	
fdba William H. Goodling Construction	:	
KELLY JEAN GOODLING,	:	
Respondents	:	

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Proof of default is demanded at trial and this paragraph is therefore denied pending Debtors' review of payments made.
8. Proof of default is demanded at trial and this paragraph is therefore denied pending Debtors' review of payments made.
9. Movant is protected by an equity cushion and this averment is therefore denied. The value of

the property is at least \$350,000.00 and the first mortgagee filed a claim for \$171,521.92, evidencing equity of \$178,478.08 to which the second mortgage attaches.

10. Denied that Movant is not adequately protected as there is a substantial equity cushion.

11. Denied that Rule 4001(a)(3) should not be applicable and denied that the Movant should be allowed to immediately enforce and implement the Order granting relief from the automatic stay.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

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